

Checklist of Required Items for Electricity Broker Applications – Applications may be rejected if documents are not available at the time of submission.

- ☒ Registration of Trade, Business & Fictitious Name Certificate for each Delaware County where business is expected to be conducted Exhibit N/A
- ☒ Names under which Applicant or its Affiliated Interests, or any current or previous officer, director, or manager has done business in Delaware Exhibit N/A
- ☒ Certification Documents from the state of formation or incorporation Exhibit A
- ☒ Delaware Certificate of Good Standing Exhibit A
- ☒ Delaware Business License Exhibit A
- ☒ Leadership Information Exhibit B
- ☒ Graphical Depiction of Corporate Structure Exhibit B
- ☒ Criminal Activities Statement Exhibit N/A
- ☒ Certified Financial Statements (dated within one year of filing), 10-K and Annual Report to Shareholders (if required) Exhibit C
- *If filed under confidential seal a redacted version and attestation must be uploaded separately in DelaFile**
- Publicly traded applicants – recent annual report and SEC Form 10-K Exhibit N/A
- ☒ Bankruptcy disclosure Exhibit N/A
- ☒ Security Bond (if required by the Commission) Exhibit N/A
- ☒ Verification of Application Exhibit E
- ☒ Marketing Plans and Materials Exhibit D
- ☒ States presently selling electricity supply/broker services and pending applications (if additional space is required) Exhibit F
- ☒ States in which authority to supply services has been received but not currently providing services Exhibit N/A
- ☒ State or Federal Jurisdictions where Applicant or affiliate interest has been found in violation of state's laws, rules or regulations Exhibit N/A
- ☒ Any settlement, adjudication, or court order in reference to any action taken by a state Attorney General, the Federal Trade Commission, the U.S. Department of Justice concerning the Applicants participation in listed markets Exhibit N/A

Additional Items for Suppliers:

- ☐ List of states in which Applicant has been denied approval and/or had authority revoked (detailed explanation) Exhibit _____
- ☐ Pending Proceedings Exhibit _____
- ☐ Security Bond (if required) Exhibit _____
- ☐ Other materials submitted in support of the Application Exhibit _____



☒ Provide a Certificate of Good Standing issued by the Delaware Secretary of State dated within the past 12 months certifying that the Applicant is in good standing and qualified to do business in Delaware. Provided in **Exhibit A**

- ☒ Provide a copy of the Applicants Delaware Business License certifying that the Applicant is registered and/or qualified to do business in Delaware. Provided in Exhibit A

4. Delaware Registered Agent:

Each Applicant shall provide a designation in writing of the name and address of a person resident within the State of Delaware upon which service of any notice, order or process may be made. This information must be updated if changed.

Registered Agent Solutions, Inc.

Name

9 E. Loockerman Street Suite 311 Dover DE 19901

Address

888-705-7274

Phone

5. Leadership:

Provide the names, titles, addresses, and telephone numbers of the Applicants' principal officers, directors, partners, or other similar officials. Provided in Exhibit B

6. Corporate Structure:

Each Applicant shall provide a description of the Applicant's corporate structure, including all parent, affiliated, and subsidiary companies. Additionally, please provide a graphical depiction of such structure. Provided in Exhibit B

Single Member S-Corp

- 7. Name, title, and telephone number of a Regulatory Contact Person:** This person will ordinarily be the initial point of contact for resolving complaints filed with the Commission. The Commission will also send any correspondence to this person. This information is required to be updated if there is a change.

Aharon Gartenberg

Name of Regulatory Contact
President

Title
732.637-9288

Telephone Number
aygart@lowerwatt.com

Email Address

- 8. Name, title, and telephone number of Complaint Contact Person:** If contact is different from the Regulatory Contact.

Aharon Gartenberg

Name of Complaint Contact
President

Title

1-888-545-9288

Telephone Number

contact@lowerwatt.com

Email Address

9. **Name, title, and telephone number of Applicant's Attorney:** This person will ordinarily be the initial point of contact for resolving complaints filed with the Commission. The Commission will also send any correspondence to this person. This information is required to be updated if there is a change.

Name of Attorney

Firm

Address

Telephone Number

Email Address

☒ No Attorney

10. **Toll-free telephone number of Applicants customer service department:** This number will be listed on the Commission's website as a resource for existing and potential customers.

1-888-545-9288

Toll-free customer service number

11. **Consent to Jurisdiction:** A statement consenting to the jurisdiction of the Delaware courts for acts or omissions arising from the Electric Supplier's and its Agent's in the State.

By (signature)

Aharon Gartenberg

Typed or Printed Name

President

Title

12. Criminal activities statement:

- ☐ A statement detailing any criminal activities, except for misdemeanors or lesser violations, of which the Applicant, any of its Affiliated Interests, officers, and directors (and prior officers and directors who left the Applicant's employ less than three (3) months before the filing of the application) have been convicted. Any criminal disclosure shall include a copy of any order of conviction and restitution. Provided in **Exhibit** _____
- ☒ Neither the Applicant nor its affiliated interests, officers or directors have been charged or convicted of any criminal activities.

13. Certified Financial Statements and other indicia of financial capability: Applicants submitting European-style financial statements shall include a statement of similarity.

- ☒ Provide copies of certified financial statements (balance sheet, income statement, statement of cash flows current within twelve (12) months of the filing). Provided in **Exhibit** C (If publicly traded the Applicant must submit the certified financial statements AND its most recent annual report to the shareholders and SEC Form 10-K, or a link to the report on the SEC website. If not publicly traded, the Applicant must submit the accounting statements, including balance sheet and income statement, audited financial statements, bank account statements, tax returns or other indicia of financial capability, or if applicable, the certified financial statements of a publicly traded parent.)
- ☐ Other indicia of financial capability submitted in support of the application (should be current within twelve (12) months of the filing). Provided in **Exhibit** _____

14. Bankruptcy disclosure:

- ☐ See **Exhibit** _____ for detailed statement of all bankruptcy proceedings filed by the Applicant in the past 24 months
- ☒ Neither the Applicant nor its affiliated interests has filed bankruptcy in the past 24 months

15. Compliance with Regional Requirements:

- ☒ Applicant agrees to only work with an entity that complies with PJM's requirements and is a Certified Electric Supplier in Delaware.

Provide a brief a list of Electric Suppliers through which the Applicant intends to arrange for the sale of electricity (**any change to this list must be updated with the Commission within five (5) Business Days of the change**):

Delaware Public Service Commission
Electric Broker Certificate

Agera Energy, Champion Energy Services, Constellation NewEnergy, Direct Energy, GDF Suez, NextEra, UGI, East Coast Power and Gas
Mid- American Energy, MP2 Energy, Reliant Energy, Spark Energy, WGL Energy

16. Description of the nature of the business being conducted: Description of service, types of customers and geographic area to be served.

Description of service:

Types of Customers: *Check all that apply*

- ☒ Residential ☒ Large Commercial
☒ Industrial ☒ Small Commercial

Geographic Area: *Applicant should check one or both*

- ☒ Delmarva Power & Light Service Territory
☒ Delaware Electric Cooperative Services Territory

17. Relevant retail experience of each principal officer responsible for Delaware

operations. In order to fulfill the requirements of the Supplier Rules an Applicant must present substantial evidence of technical and managerial competency the Applicant must submit, in an attachment, detailed professional resumes including dates, jobs/ job titles and duties for each principal officer responsible for operations in Delaware.

☒ Provided in Exhibit D

18. List of states presently selling electric supply/broker services and a list of state with pending applications: Please provide a list of the states in which the Applicant, or any of its affiliates, is now or has been engaged in the retail sale of electricity, status of the application

(approved or pending), type of license, license number (if approved) or commission docket number (if pending):

State	Status	Type of License	Broker	License No.	Date Issued
PA	APP	Broker	A-2015-2466624	5.19.15	
IL	App	Broker	17-0301	8.15.2017	
MD	APP	Broker	IR-3926	7.26.2017	
OH	APP	Broker	17-1252E(1)	8.11.2017	
MD	APP	Broker	IR-3925	7.26.2017	
OH	APP	Broker	17-615G (1)	8.7.17	
PA	APP	Broker	A-2015-2470044	7/8/15	
NJ	APP	Broker	EA-0152	9.30.14	
MA	APP	Broker	EB-369	9/25/17	

*If more space is required please attach a separate sheet of paper with the above information. **Provided in Exhibit** N/A

Applicant shall provide a copy of any order or decision from the state's public utility commission for each state listed above. **Provided in Exhibit F

19. List of states in which Applicant has received authority to sell/broker services but is not currently providing services. Not Applicable

State: _____	Status: _____	Type of License: _____	License No: _____	Date Issued: _____
State: _____	Status: _____	Type of License: _____	License No: _____	Date Issued: _____
State: _____	Status: _____	Type of License: _____	License No: _____	Date Issued: _____
State: _____	Status: _____	Type of License: _____	License No: _____	Date Issued: _____

*Applicant shall provide a copy of any order or decision from the state's public utility commission for each state listed above. **Provided in Exhibit** N/A

20. Other Proceedings - List of states or federal jurisdictions in which Applicant or its Affiliated Interests has been denied approval and/or had authority revoked.

State: _____ Date certified: _____ Not Applicable
State: _____ Date certified: _____

*If the applicant has been denied approval or had its authority revoked by a state Commission please provide a detailed explanation for each state. **Provided in Exhibit** _____

☐ Applicant has never been denied or revoked

21. List of States or Federal jurisdictions in which the Applicant or any of its Affiliated Interests has been found to be in violation of a state's laws, rules or regulations.
Provided in Exhibit None

22. Please provide a copy of any settlement, adjudication, or court order with respect to an action filed by a state Attorney General, the Federal Trade Commission, or U.S. Department of Justice concerning the Applicant's participation in retail and federal electricity, natural gas, or telecommunications markets.
Provided in Exhibit None

23. Pending Proceedings for revocation/suspensions: Applicant shall provide a list of proceedings in which a revocation or suspension of authority to sell or broker electricity is pending or has been adjudicated, and the name case number, venue, final orders and settlement agreements for each case identified.

State: <u>None</u>	Case Number: _____	Venue: _____	Final Order No: _____	Date Issued: _____
State: _____	Case Number: _____	Venue: _____	Final Order No: _____	Date Issued: _____
State: _____	Case Number: _____	Venue: _____	Final Order No: _____	Date Issued: _____

☐ Additional information provided in **Exhibit** _____

24. Security: The Commission may determine that an Applicant requesting to be a Broker is required to post security in the amount of \$10,000 in order to ensure that the Applicant has sufficient financial ability to operate as a Broker in the State. This will be determined on a case-by-case basis.

25. Any other information:

- ☐ Other material submitted in support of the Application. Provided in **Exhibit** _____
- ☒ No other supporting material is provided

26. Verification of Application: The Application must be accompanied by a signed, notarized verification of a principal officer of the Applicant stating that all information in the application is true and correct as filed to the best of the principal's or officer's belief. Where the Applicant is a corporation or an association, the verification shall be signed by an officer thereof and notarized. (See Attachment A for an example)

☒ Verification is provided in **Exhibit** ^E _____

27. Waiver of certification requirements: Only applicable to Applicants requesting a waiver.

- ☐ Applicant requests a waiver of the requirements in Section(s) _____. Please provide a detailed explanation in support of the request for a waiver below: *If additional space is required please attach additional sheets of paper to the Application as necessary.* Provided in **Exhibit** _____

☒ No waiver requested

28. Marketing Plans and Materials: If the Applicant intends to serve Residential and Small Commercial, the Applicant shall provide the marketing plan and all marketing materials (please see Reg. 49, Supplier Rule - **Sections 2.2.13 – 2.2.14** for a complete list of materials to be submitted).

Please provide a description of the marketing plan(s) and/or methods Applicant plans to use in Delaware, the description should identify whether Door-to-Door, Telemarketing, direct mail, or other marketing channels will be used and, where applicable, the identification of third party vendors that the Applicant will utilize. Additionally, please include the manner in which the Applicant will ensure oversight, training, and compliance with the Supplier Regulations.

Exclusively independent sales reps

☐ Additional information provided in **Exhibit** ^D _____

**STATE OF NEW JERSEY
DEPARTMENT OF THE TREASURY
DIVISION OF REVENUE AND ENTERPRISE SERVICES
SHORT FORM STANDING**

LOWER WATT LLC
0400425084

I, the Treasurer of the State of New Jersey, do hereby certify that the above-named New Jersey Domestic Limited Liability Company was registered by this office on June 21, 2011.

As of the date of this certificate, said business continues as an active business in good standing in the State of New Jersey, and its Annual Reports are current.

I further certify that the registered agent and office are:

AHARON GARTENBERG
18 JULE CT
LAKEWOOD, NJ 08701



*IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
my Official Seal at Trenton, this
23rd day of May, 2019*

A handwritten signature in black ink, appearing to read "Elizabeth Maher Muoio".

Elizabeth Maher Muoio
State Treasurer

Certificate Number : 6097669652

Verify this certificate online at

https://www1.state.nj.us/TYTR_StandingCert/JSP/Verify_Cert.jsp

NEW JERSEY DEPARTMENT OF THE TREASURY
DIVISION OF REVENUE

CERTIFICATE OF FORMATION

LOWER WATT LLC

0400425084

The above-named DOMESTIC LIMITED LIABILITY COMPANY was duly filed in accordance with New Jersey state law on 06/21/2011 and was assigned identification number 0400425084. Following are the articles that constitute its original certificate.

1. Name:

LOWER WATT LLC

2. Registered Agent:

AHARON Y GARTENBERG

3. Registered Office:

12 NORTH CREST PLACE
LAKEWOOD, NJ 08701

4. Business Purpose:

BROKERAGE

Signatures:

AHARON GARTENBERG

AUTHORIZED REPRESENTATIVE



Certification# 120796883

Verify this certificate at

https://www1.state.nj.us/TYTR_StandingCert/JSP/Verify_Cert.jsp

*IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed my
Official Seal at Trenton, this
21st day of June, 2011*

A handwritten signature in black ink, appearing to read "Andrew P. Sidamon-Eristoff".

Andrew P Sidamon-Eristoff
State Treasurer

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY "LOWER WATT, LLC" IS DULY REGISTERED
UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND
HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS
OF THE TWENTY-THIRD DAY OF AUGUST, A.D. 2019.



7443525 8300

SR# 20196600312

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBullock", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Jeffrey W. Bullock, Secretary of State

Authentication: 203463568

Date: 08-23-19

LICENSE NO. **2019605301****STATE OF DELAWARE**
DIVISION OF REVENUE**VALID**

06/21/2019 - 12/31/2019

POST CONSPICUOUSLY

NOT TRANSFERABLEBUSINESS CODE **120**LICENSED
ACTIVITY**BROKER**DLN: **19-92171-15-000**DATE ISSUED: **06/24/2019******VALIDATED******2019**LICENSE FEE: \$ **14.50**

MAILING ADDRESS

**LOWER WATT LLC
18 JULE CT
LAKEWOOD NJ 08701-3753****BUSINESS LICENSE**

BUSINESS LOCATION

**LOWER WATT LLC
18 JULE CT
LAKEWOOD NJ 08701-3753**IS HEREBY LICENSED TO PRACTICE, CONDUCT OR ENGAGE IN THE OCCUPATION
OR BUSINESS ACTIVITY INDICATED ABOVE IN ACCORDANCE WITH THE LICENSE
APPLICATION DULY FILED PURSANT TO TITLE 30, DEL CODE.Jennifer R. Hudson, Esquire
DIRECTOR OF REVENUE**IMPORTANT – TEAR AT ABOVE PERFORATION AND DISPLAY IN A PUBLIC LOCATION**

Unique ID#:

B17735661535 002Business Code **120**
Group CodeLicensed
Activity**BROKER**

The 2019 State of Delaware License printed above must be posted in a public area at the location address listed. If you have any questions regarding this license, please call (302) 577-8778.

REPLACEMENT LICENSES

Keep this portion of your license separate, in case you need a replacement for any lost, stolen or destroyed license. A \$ fee will be charged for the replacement of a license. Send the \$ along with a copy of this form or provide your Federal Employer Identification Number, or Social Security Number, suffix, Business Code, Business Name and address to Delaware Division of Revenue, Attn.: Business Master File, PO Box 8763, Wilmington, DE 19899-8763. You will receive your replacement license within three to four weeks.

OTHER IMPORTANT INFORMATION

Most licensees are also required to pay either gross receipts or excise taxes in addition to the license fee. You can file these taxes online or obtain a paper form from our website at www.revenue.delaware.gov. You must submit all business tax returns filed with the Division of Revenue under the same identification number. If you are a sole-proprietor, and have a federal employer identification number, use the employer identification number, not your social security number. Only sole proprietors with no employees are allowed to file under their social security number. Inquiries regarding your coupon booklets to pay withholding, corporate tentative and Sub Charter 'S' estimated taxes; or to make changes to your name, address or identification number should be directed to the Business Master File unit at (302) 577-8778. You may also E-mail us at: BUSTAX@state.de.us.

INTERNET SITE

The Division of Revenue web address is: www.revenue.delaware.gov. Visit our web site for tax tips, links to telephone numbers, forms that you can download, links to other State agencies, the Delaware Code, the publication 'Delaware for Small Business' and lots more. Internet filing of personal income tax returns via the Division of Revenue's website is available. Internet filing for Withholding, Gross Receipts and Corporate Tentative payments is also available.

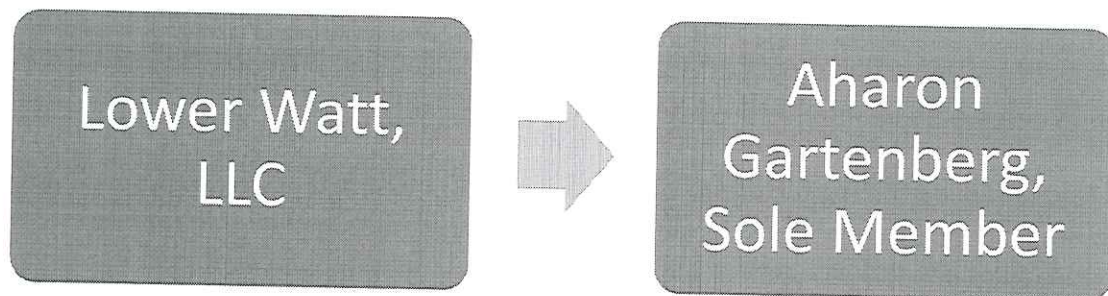
Principal, Officers, Directors, & Partners

Officer: Aharon Gartenberg

Title: President (owner 100%)

Address: 18 Jule Ct. Lakewood, NJ 08701

Telephone number: 732-637-9288



Attachment B

Attestation of Submission of Confidential, Proprietary, and Privileged Material
Per 26 Del. Admin. C. § 1001-1.11

I, | Aharon Gartenberg, President of Lower Watt, LLC, do hereby attest, under penalty of perjury, that Financial documents/ Exhibit C is 1) not a "public record" as defined by 29 Del. C. § 10002(l) because it is Financial documents/information UNDER 29 Del. C. § 10002(l); and 2) is not subject to inspection by either the public or by other parties unless an appropriate proprietary agreement is executed.

As such, I request that the Delaware Public Service Commission accord confidential treatment to Financial Documents/Exhibit C in accordance with 26 Del. Admin. C. § 1001-1.11.

In compliance with 26 Del. Admin. C. § 1001-1.11.3, I have submitted, attached to this Attestation, for filing a copy of the document described above without the confidential information, with an indication that the claimed confidential information has been deleted.

Executed [DATE]

5/14/19

[NAME]

Aharon Gartenberg

[STATE]

New Jersey

[COUNTY]

Ocean

Sworn to and subscribed before me on [DATE] by [NAME]

5/14/19, Aharon Gartenberg

Leah Gray

[NOTARY SEAL]

[NOTARY NAME]

My commission expires:

8/22/22

LEAH GRAY
NOTARY PUBLIC OF NEW JERSEY
Comm. # 50068705
My Commission Expires Aug. 22, 2022

Technical and Managerial Competency

aygart@lowerwatt.com

(732) 637-9288

AHARON GARTENBERG

ACCOMPLISHMENTS Built Lower Watt, LLC from a startup to now servicing over 2000 accounts, 100,000 mWh and 2,000,000 dth in 3 states and 15 utilities

SKILLS & ABILITIES

- Energy Markets
- Utility bill analysis
- Energy Policy

PROFESSIONAL EXPERIENCE **PRESIDENT, LOWER WATT, LLC**

6/23/2011-Present

Manages sales stream and supplier relationships, Analyzes utility usage and supplier contract to find the best match for each account

INDEPENDENT AGENT, GATEWAY ENERGY

8/2010-6/23/2011

Retail energy sales

LECTURER, TORAH LINKS AT JFK MEDICAL CENTER

2012

Gave lectures to medical staff at JFK Medical Center on Jewish Medical Ethics

RESEARCH FELLOW

2/2000-8/2007

Performed research on Mathematics in the Talmud for an Associate Professor at Baruch College of CUNY

EDUCATION **BETH MEDRASH GOVOHA**

Talmudic Law with a fellowship in Rabbinics

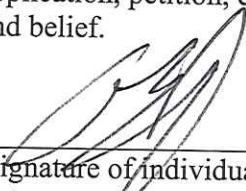
Exhibit

Marketing


Lower Watt typically markets for new customers via our dedicated sales team reaching out to new prospects. There are no materials used, rather a nice friendly conversation. Meetings are held with our reps monthly to ensure oversight, training, and compliance with new regulations. We also discuss topics of interest relating to overall accounts. Our website is a bit outdated and we hope to have a new one set up in the future, but for now we do utilize it a bit when needed.

Attachment A
VERIFICATIONSTATE OF New Jersey)
COUNTY OF Ocean) SS

On this 14th day of May, 2019, personally came before me, the subscriber, a Notary Public in and for the state and county aforesaid, Aharon Gartenberg [name of individual who is signing] as the President [authority of individual or title of individual who is signing, e.g., President, Vice President, Sole Member/Manager, Trustee, etc.] of Lower Watt LLC [name of company or entity that is filing], known to me personally to be such or having presented to me satisfactory evidence of identity, and acknowledged this document to be [his or her] act and deed and the act and deed of such LLC [type of filer, e.g. corporation, limited liability company, etc.], that the signature of such individual is in [his or her] own proper handwriting, and that the facts set forth in this application [type of filing, e.g., application, petition, etc.] are true and correct to the best of [his or her] knowledge, information, and belief.

→ 
Signature of individual
Printed Name: Aharon Gartenberg

SIGNED AND SWORN (OR AFFIRMED) before me on this 14th day of May, 2019, by Aharon Gartenberg (name of individual who signed above).

→ 
Signature of Notarial Officer
Notary Public
Title (e.g., Notary Public)

SEAL

My Commission Expires:

Aug 22, 2022

LEAH GRAY
NOTARY PUBLIC OF NEW JERSEY
Comm. # 50066705
My Commission Expires Aug. 22, 2022

COMMISSIONERS

W. KEVIN HUGHES
CHAIRMAN

HAROLD D. WILLIAMS
MICHAEL T. RICHARD
ANTHONY O'DONNELL

STATE OF MARYLAND



PUBLIC SERVICE COMMISSION

#43, 7/26/17 AM; ML# 215849
License Reference No.: IR-3925

July 26, 2017

Aharon Gartenberg
LOWER WATT, LLC
18 Jule Court
Lakewood, NJ 08701

Dear Mr. Gartenberg:

On June 27, 2017, LOWER WATT, LLC, ("Company") filed an Application for a License Supply Natural Gas or Natural Gas Supply Services under COMAR 20.54. The Company proposes to provide natural gas supplier services in Maryland for residential, commercial and industrial customers as described in the application.

After considering this matter at the July 26, 2017 Administrative Meeting, the Commission granted the Company a license to supply natural gas or natural gas supply services in Maryland (License Reference Number IR-3925). The license granted by the Commission under this Letter Order is limited solely to natural gas supplier broker and for the customer classes and service territories recommended by Staff.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

/s/ David J. Collins

David J. Collins
Executive Secretary

DJC/st

cc: Phil VanderHeyden, Electricity Division
Obi Linton, Director, External Relations

WILLIAM DONALD SCHAEFER TOWER • 6 ST. PAUL STREET • BALTIMORE, MARYLAND 21202-6806

410-767-8000

Toll Free: 1-800-492-0474

FAX: 410-333-6495

MDRS: 1-800-735-2258 (TTY/Voice)

Website: www.psc.state.md.us

W. KEVIN HUGHES
CHAIRMAN

HAROLD D. WILLIAMS
MICHAEL T. RICHARD
ANTHONY O'DONNELL



PUBLIC SERVICE COMMISSION

#44, 7/26/17 AM; ML# 215850
License Reference No.: IR-3926

July 26, 2017

Aharon Gartenberg
LOWER WATT, LLC
18 Jule Court
Lakewood, NJ 08701

Dear Mr. Gartenberg:

On June 27, 2017, LOWER WATT, LLC, ("Company") filed an Application for a License to Supply Electricity or Electric Generation Services in Maryland under COMAR 20.51. The Company proposes to provide electricity supplier services in Maryland for residential, commercial and industrial customers as described in the application.

After considering this matter at the July 26, 2017 Administrative Meeting, the Commission granted the Company a license to supply electricity or electric generation services in Maryland (License Reference Number IR-3926). The license granted by the Commission under this Letter Order is limited solely to electricity supplier broker services for the customer classes and service territories applied for and recommended by Staff.

Finally, the Company is reminded that it is under a continuing obligation to notify the Commission within 30 days of any changes to the information upon which the Commission relied in granting this license. A copy of the supplemental or updated information is required to be filed concurrently with the Office of People's Counsel.

By Direction of the Commission,

/s/ David J. Collins

David J. Collins
Executive Secretary

DJC/st

cc: Phil VanderHeyden, Electricity Division
Obi Linton, Director, External Relations



Philip D. Murphy
Governor

Sheila Y. Oliver
Lt. Governor

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 3rd Floor, Suite 314
Post Office Box 350
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

Joseph L. Fiordaliso
President

Aida Camacho-Welch
Secretary of the Board

March 29, 2019

Aharon Gartenberg
President
Lower Watt, LLC
18 Jule CT
Lakewood, NJ 08701

Re: **Energy Agent, Private Aggregator, and Energy Consultant Initial Registrations**
Docket Nos. EE19010035L & GE19010036L

Dear Mr. Gartenberg:

In accordance with the Electric Discount and Energy Competition Act of 1999, N.J.S.A. 48:3-49 et seq., at its March 29, 2019 Agenda meeting, the New Jersey Board of Public Utilities voted to issue the **REGISTRATIONS** as an Energy Agent, Private Aggregator, and Energy Consultant to Lower Watt, LLC. The company's registration numbers are EA-0544, PA-0229, and EC-0178.

The enclosed registrations are effective March 29, 2019 and will expire on March 28, 2020. These registrations and the rights thereunder are **Non-Transferable**.

This letter is not an endorsement of, nor is it intended for use in, the marketing promotions of the registrant. Registrants shall comply with all applicable law, including the Electric Discount and Energy Competition Act, which prohibits the unauthorized change of a customer's energy provider and other fraudulent and illegal marketing activities.

If you have any questions, please contact Darren Erbe at (609) 292-1406.

Sincerely,

A handwritten signature in blue ink that reads "Aida Camacho-Welch".

Aida Camacho-Welch
Secretary of the Board

ACW/dee
Encl.(s)

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

Lower Watt, LLC

18 Jule Court

Lakewood, New Jersey 08701

To conduct business in the State of New Jersey as an

Energy Agent




Aida Camacho-Welch
Secretary of the Board

Registration No. EA-0544
Effective Date: March 29, 2019
Expiration Date: March 28, 2020

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

Lower Watt, LLC

18 Jule Court

Lakewood, New Jersey 08701

To conduct business in the State of New Jersey as a

Private Aggregator



Aida Camacho-Welch

Aida Camacho-Welch
Secretary of the Board

Registration No. PA-0229
Effective Date: March 29, 2019
Expiration Date: March 28, 2020

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

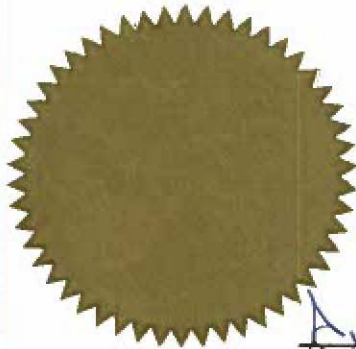
HEREBY REGISTERS

Lower Watt, LLC

18 Jule Court
Lakewood, New Jersey 08701

To conduct business in the State of New Jersey as an

Energy Consultant




Aida Camacho-Welch
Secretary of the Board

Registration No. EC-0178
Effective Date: March 29, 2019
Expiration Date: March 28, 2020



**Public Utilities
Commission**

Sam Randazzo, Chairman

Commissioners

M. Beth Trombold
Lawrence K. Friedman
Dennis P. Deters
Daniel R. Conway

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

RENEWAL

Certificate Number:

17-1252E (2)

Issued Pursuant to Case Number(s):

17-1548-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to **Lower Watt, LLC** whose office or principal place of business is located at **18 Jule Court Lakewood, NJ 08701** to provide **aggregation and power broker** services within the State of Ohio effective **August 5, 2019**.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: August 7, 2019.

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

Tanowa M. Troupe, Secretary
Susan Patterson, Acting Secretary
Beverly Hoskinson, Acting Secretary

Certificate Expires: August 5, 2021

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.

Technician mmm Date Processed 08/07/19

FILE

CRES AUTOMATIC CASE ACTION FORM

Date: **8-5-19**

Case Number: **17-1548-EL-AGG**

Company Name and Company Name d/b/a: **Lower Watt, LLC**

Company Address: **18 Jule Ct**

Company City/State/Zip: **Lakewood NJ 08701**

Regulatory Contact: **Aharon Gartenberg**

Phone: **732-637-9288**

Email: **aygart@lowerwatt.com**

Address: **18 Jule Ct**

City/State/Zip: **Lakewood NJ 08701**

☒ Renewal

Action Needed:

☐ Issue Certificate Number to:

Effective Date of Certificate:

Certificate Expires:

☒ Renew Certificate Number from: **17-1252E (1)** to: **17-1252E (2)**

Effective Date of Certificate: **8-5-19** Certificate Expires: **8-5-21**

☒ Certified To Provide the Following Services:

☐ Retail Generation

☒ Aggregation

☐ Power Marketer

☒ Power Broker

☐ Governmental Aggregation

☐ Revise Certificate Number: to (check all applicable):

☐ Reflect name change from: to

☐ Reflect address change from: to

☐ Correct Administrative Error:

☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 17-1548-EL-AGG
CASE DESCRIPTION: LOWER WATT LLC
DATE OF SERVICE: 8/6/2019
DOCUMENT SIGNED ON: 8/17/2019

Sign Here: Dani

PARTY OF RECORD	APPLICANT	ATTORNEY
Lower Watt LLC, Aharon Gartenberg 18 Jule Court Lakewood ,NJ 08701 Phone:7326379288 Email:www.lowerwatt.com	NONE	

PARTY OF RECORD	ATTORNEY	ATTORNEY
none	*Gartenberg, Aharon Mr. Lower Watt LLC 18 Jule Ct Lakewood,NJ 08701 Phone:(800)292-0909 Email:jselzer@licensealogix.com	
none	*Gartenberg, Aharon Mr. Lower Watt, LLC 18 Jule Ct Lakewood,NJ 08701 Phone:(732)637-9288 Fax:(866)998-1882 Email:aygart@lowerwatt.com	

PARTY OF RECORD	FILER	ATTORNEY
LICENSELOGIX SANDRA ERICKSON	NONE	

140 GRAND STREET, SUITE 300

WHITE PLAINS,NY 10601

Phone:800-292-0909 X314

Email:SERICKSON@LICENSELOGIX.COM

FILE

The Public Utilities Commission of Ohio

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Renewal

Issued pursuant to Case Number(s):

17-1549-GA-AGG

is

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:

17-615G (2)

Granted to:

Lower Watt, LLC

Whose office or principal place of business is located at:

18 Julie Ct, Lakewood, NJ 08701

And is hereby certified to provide:

Retail Natural Gas Aggregator/Broker Services

within the state of Ohio, for a two-year period.

Certification Effective:

August 5, 2019 through August 5, 2021

The certification of Ohio competitive retail natural gas aggregators/brokers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

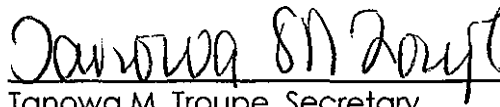
Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **August 7, 2019**

By Order of

The Public Utilities Commission of Ohio



Tanowa M. Troupe, Secretary

Susan Patterson, Acting Secretary

Beverly Hoskinson, Acting Secretary

Form No. CRNGS/AGG/B-06

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Technician mm

Date Processed 08/07/19

CRNGS AUTOMATIC CASE ACTION FORM

Date: **8/6/2019**

Case Number: **17-1549-GA-AGG**

Company Name and Company Name d/b/a: **Lower Watt, LLC**

Company Address: **18 Juie Ct**

Company City/State/Zip: **Lakewood NJ 08701**

Regulatory Contact: **Aharon Gartenberg**

Phone: **732-637-9288**

Email: **aygart@lowerwatt.com**

Address: **18 Juie Ct**

City/State/Zip: **Lakewood NJ 08701**

☒ Renewal

Action Needed:

☐ Issue Certificate Number: _____ to: _____
Effective Date of Certificate: _____ Certificate Expires: _____

☒ Renew Certificate Number from: **17-615G(1)** to: **17-615G(2)**
Effective Date of Certificate: **8/05/2019** Certificate Expires: **8/05/2021**

☒ Certified To Provide the Following Services:

- ☒ Retail Natural Gas Aggregator
- ☒ Retail Natural Gas Broker
- ☐ Retail Natural Gas Supplier/Marketer
- ☐ Natural Gas Governmental Aggregator

☐ Revise Certificate Number: _____ to (check all applicable):

- ☐ Reflect name change from: _____ to _____
- ☐ Reflect address change from: _____ to _____
- ☐ Correct Administrative Error:
- ☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 17-1549-GA-AGG
CASE DESCRIPTION: LOWER WATT LLC
DATE OF SERVICE: 8/7/2019
DOCUMENT SIGNED ON: 8/7/2019

Sign Here: Dani

PARTY OF RECORD	APPLICANT	ATTORNEY
Lower Watt LLC, Aharon Gartenberg 18 Jule Court Lakewood ,NJ 08701 Phone:7326379288 Email:www.lowerwatt.com	NONE	

PARTY OF RECORD	ATTORNEY	ATTORNEY
none	*Gartenberg, Aharon Mr. Lower Watt LLC 18 Jule Ct Lakewood,NJ 08701 Phone:(800)292-0909 Email:jselzer@licensealogix.com	
none	*Gartenberg, Aharon Mr. Lower Watt, LLC 18 Jule Ct Lakewood,NJ 08701 Phone:(732)637-9288 Fax:(866)998-1882 Email:aygart@lowerwatt.com	

PARTY OF RECORD	FILER	ATTORNEY
LICENSELOGIX SANDRA ERICKSON	NONE	

140 GRAND STREET, SUITE 300

WHITE PLAINS, NY 10601

Phone: 800-292-0909 X314

Email: SERICKSON@LICENSELOGIX.COM

The Public Utilities Commission of Ohio

Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate

Issued pursuant to Case Number(s):
17-1549-GA-AGG

is
 Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
17-615G (1)

Granted to:
Lower Watt LLC

Whose office or principal place of business is located at:
18 Jule Court Lakewood, NJ 08701

And is hereby certified to provide:
Retail Natural Gas Aggregator/Broker Services
 within the state of Ohio, for a two-year period.

Certification Effective:
August 5, 2017 through August 5, 2019

The certification of Ohio competitive retail natural gas aggregators/brokers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

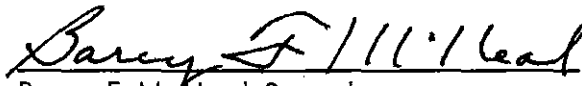
This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.


Witness the seal of the Commission affixed at Columbus, Ohio

Dated: **August 7, 2017**

By Order of
 The Public Utilities Commission of Ohio


 Barcy F. McNeal, Secretary
 Tanowa M. Troupe, Acting Secretary
 Felecia D. Burdett, Acting Secretary

Form No. CRNGS/AGG/B-06

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
 Technician  Date Processed **AUG 07 2017**

CRNGS AUTOMATIC CASE ACTION FORM

Date: **August 7, 2017**

Case Number: **17-1549-GA-AGG**

Company Name and Company Name d/b/a: **Lower Watt, LLC**

Company Address: **18 Jule Court**

Company City/State/Zip: **Lakewood, NJ 08701**

Regulatory Contact: **Aharon Gartenberg**

Phone: **732-637-9288**

Email: **aygart@lowerwatt.com**

Address: **18 Jule Court**

City/State/Zip: **Lakewood, NJ 08701**

☐ Renewal

Action Needed:

☒ Issue Certificate Number: **17-615G (1)** to: **Lower Watt, LLC**
Effective Date of Certificate: **8/5/2017** Certificate Expires: **8/5/2019**

☐ Renew Certificate Number from: to:
Effective Date of Certificate: Certificate Expires:

☒ Certified To Provide the Following Services:

- ☐ Retail Natural Gas Aggregator
- ☒ Retail Natural Gas Broker
- ☐ Retail Natural Gas Supplier/Marketer
- ☐ Natural Gas Governmental Aggregator

☐ Revise Certificate Number: to (check all applicable):

- ☐ Reflect name change from: to
- ☐ Reflect address change from: to
- ☐ Correct Administrative Error:
- ☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

CASE NUMBER: 17-1549-GA-AGG
CASE DESCRIPTION: LOWER WATT LLC
DATE OF SERVICE: 8/7/2017
DOCUMENT SIGNED ON: AUG 07 2017

Sign Here: _____

APPLICANT

PARTY OF RECORD

ATTORNEY

Lower Watt LLC, Aharon Gartenberg
18 Jule Court
Lakewood ,NJ 08701
Phone:7326379288
Email:www.lowerwatt.com

NONE

ATTORNEY

PARTY OF RECORD

ATTORNEY

none

*Gartenberg, Aharon Mr.
Lower Watt LLC
18 Jule Ct
Lakewood,NJ 08701
Phone:(800)292-0909
Email:jselzer@licensealogix.com

FILER

PARTY OF RECORD

ATTORNEY

LICENSELOGIX
SANDRA ERICKSON
140 GRAND STREET, SUITE 300
WHITE PLAINS,NY 10601
Phone:800-292-0909 X314
Email:SERICKSON@LICENSELOGIX.COM

NONE



**Public Utilities
Commission**

Asim Z. Haque, Chairman

Commissioners
M. Beth Trombold
Thomas W. Johnson
Lawrence K. Friedeman
Daniel R. Conway

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:

17-1252E (1)

Issued Pursuant to Case Number(s):

17-1548-EL-AGG

A certificate as a Competitive Retail Electric Service Provider is hereby granted to, **Lower Watt, LLC** whose office or principal place of business is located at **18 Jule Court Lakewood, NJ 08701** to provide **power broker** services within the State of Ohio effective **August 05, 2017**.

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **August 10, 2017**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

Barcy F. McNeal, Secretary

Tanowa M. Troupe, Acting Secretary

Felecia D. Burdett, Acting Secretary

Certificate Expires: August 05, 2019

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician AN Date Processed **AUG 10 2017**

CASE NUMBER: 17-1548-EL-AGG
CASE DESCRIPTION: LOWER WATT LLC
DATE OF SERVICE: 8/10/2017
DOCUMENT SIGNED ON: AUG 10 2017

Sign Here: _____

**APPLICANT****PARTY OF RECORD****ATTORNEY**

Lower Watt LLC, Aharon Gartenberg
18 Jule Court
Lakewood ,NJ 08701
Phone:7326379288
Email:www.lowerwatt.com

NONE

ATTORNEY**PARTY OF RECORD****ATTORNEY**

none

*Gartenberg, Aharon Mr.
Lower Watt LLC
18 Jule Ct
Lakewood,NJ 08701
Phone:(800)292-0909
Email:jselzer@licenselogix.com

FILER**PARTY OF RECORD****ATTORNEY**

LICENSELOGIX
SANDRA ERICKSON
140 GRAND STREET, SUITE 300
WHITE PLAINS,NY 10601
Phone:800-292-0909 X314
Email:SERICKSON@LICENSELOGIX.COM

NONE

CRES AUTOMATIC CASE ACTION FORM

Date: **8-9-17**

Case Number: **17-1548-EL-AGG**

Company Name and Company Name d/b/a: **Lower Watt, LLC**

Company Address: **18 Jule Court**

Company City/State/Zip: **Lakewood NJ 08701**

Regulatory Contact: **Aharon Gartenberg**

Phone: **723-637-9288**

Email: **aygart@lowerwatt.com**

Address: **18 Jule Court**

City/State/Zip: **Lakewood NJ 08701**

☐ Renewal

Action Needed:

☒ Issue Certificate Number to: **Lower Watt, LLC**

Effective Date of Certificate: **8-5-17** Certificate Expires: **8-5-19**

☐ Renew Certificate Number from: to:

Effective Date of Certificate: Certificate Expires:

☒ Certified To Provide the Following Services:

☐ Retail Generation

☐ Aggregation

☐ Power Marketer

☒ Power Broker

☐ Governmental Aggregation

☐ Revise Certificate Number: to (check all applicable):

☐ Reflect name change from: to

☐ Reflect address change from: to

☐ Correct Administrative Error:

☐ Reflect Change of Ownership to:

☐ Cancel Certificate Number:

☐ Protect Un-redacted copies until:

☐ Close Case File, Case Withdrawn at Applicant's Request

☐ Close Case File

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held July 8, 2015

Commissioners Present:

Gladys M. Brown, Chairman
John F. Coleman, Jr., Vice Chairman
James H. Cawley
Pamela A. Witmer
Robert F. Powelson

Application of Lower Watt, LLC for
Approval to Offer, Render, Furnish or Supply
Electricity or Electric Generation Services
as a Broker/Marketer

Docket Number:
A-2015-2470044

ORDER

BY THE COMMISSION:

On January 14, 2015, Lower Watt, LLC (Lower Watt), Utility Code 1117390, filed an application seeking to become a licensed electric generation supplier (EGS) as a broker/marketer in all of the electric distribution company (EDC) service territories throughout the Commonwealth of Pennsylvania. The application was filed pursuant to the Commission's regulations at 52 Pa. Code §§54.31-54.43, which became effective on August 8, 1998, and which were established under Section 2809 of the Public Utility Code, 66 Pa. C.S. §2809.

§2809 provides in pertinent part that:

License Requirement.--No person or corporation, including municipal corporations which choose to provide service outside their municipal limits except to the extent provided prior to the effective date of this chapter, brokers and

marketers, aggregators and other entities, shall engage in the business of an electric generation supplier in this Commonwealth unless the person or corporation holds a license issued by the Commission. 66 Pa. C.S. §2809.

An electric generation supplier is defined as:

A person or corporation, including municipal corporations which choose to provide service outside their municipal limits except to the extent provided prior to the effective date of this chapter, brokers and marketers, aggregators or any other entities, that sells to end-use customers electricity or related services utilizing the jurisdictional transmission or distribution facilities of an electric distribution company, or that purchases, brokers, arranges or markets electricity or related services for sale to end-use customers utilizing the jurisdictional transmission and distribution facilities of an electric distribution company. 66 Pa. C.S. §2803.

Lower Watt is a foreign limited liability company, formed in the State of New Jersey as of June 2, 2011, and registered to do business in the Commonwealth of Pennsylvania on May 29, 2014. Lower Watt proposes to act as a broker/marketer of retail electric power to residential, small commercial (25 kw and under demand), large commercial (over 25 kw demand) industrial, and governmental customers. Lower Watt has indicated that it will not be taking title to electric power, nor paying customers' bills in its broker/marketer role.

Regarding the financial and technical requirements of the license application, Lower Watt has submitted two years of CPA compiled financial statements. Lower Watt has also supplied extensive resume data for its chief officers, as well as a business plan and a copy of its license to operate in New Jersey. We find that sufficient information has been provided by Lower Watt to demonstrate its financial and technical fitness in order to be licensed as a broker/marketer of retail electric power in all of the EDC service territories throughout the Commonwealth of Pennsylvania.

Since Lower Watt will be providing electric generation supplier services to residential customers it is required to comply with, and be governed by, applicable Chapter 56 residential service regulations as set forth in the Commission Order *Guidelines for Maintaining Customer Service at the Same Level of Quality Pursuant to 66 Pa. C.S. §2807(d), and Assuring Conformance with 52 Pa. Code Chapter 56 Pursuant to 66 Pa. C.S. §2809(e) and (f)*, at Docket No. M-00960890 F0011, Order entered July 11, 1997. Thus, we deem it appropriate to reiterate certain items with respect to Chapter 56 of our regulations. Chapter 56 (52 Pa Code Chapter 56) is applicable to residential accounts. An electric generation supplier cannot physically disconnect a residential customer from the electricity grid; therefore, the rules relating to residential service termination are not applicable to electric generation suppliers. An electric generation supplier may seek to terminate its generation service through an appropriate written notice to the customer and the distribution company. The residential customer can then attempt to repair their relationship with the supplier, seek a new supplier, or return to utility service at default service rates in accordance with the utility's obligations under Section 2807(e), 66 Pa. C.S. §2807(e). The customer would only be disconnected from the electricity grid pursuant to appropriate regulations if the customer failed to meet its obligations to the utility or the electric generation supplier that has been designated by the Commission as the provider of last resort.

Additionally, we specifically note that the licensee must comply with, and ensure that its employees, agents, representatives and independent contractors comply with the standards of conduct and disclosure for licensees set out in Commission regulations at 52 Pa. Code §54.43 that were enacted to protect consumers of this Commonwealth. These standards include, *inter alia*, the provision of timely and accurate information about the services offered by the licensee, the practice of nondiscrimination in service in regard to race, color, religion, national origin, marital status, etc., the safeguarding of a consumer's personal information, and compliance with applicable state and federal consumer protection laws. We further note that the licensee and its agents must comply with the Commission's

sales and marketing regulations at 52 Pa. Code §111.1, et seq. applicable to residential customers. Among other things, these regulations require the licensee and its agents to provide accurate information about products and services being offered and prohibit a licensee and its agents from engaging in misleading or deceptive conduct and from making false or misleading representations. Also, we take this opportunity to remind the licensee of its agreement to abide by, and to ensure that its employees, representatives, agents and independent contractors abide by all applicable federal and state laws, and Commission regulations, procedures and orders, including Emergency Orders, which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

Lower Watt did not provide a \$250,000 bond as required by the license application; however, it did provide a bond in the amount of \$10,000 and requests that the Commission reduce its security requirement from \$250,000 to \$10,000. In support of this request, Lower Watt explains that it will not be collecting any gross receipts from its customers, paying customer bills or taking title to electricity. Its services include analyzing client electricity loads and negotiating the purchase of electricity for its clients.

The Commission believes that the reasoning on which Lower Watt bases its request for a bond reduction from \$250,000 to \$10,000 is similar to that offered by the other EGSs that have successfully petitioned the Commission for a bonding level of \$10,000. Two of the EGSs are Co-eXprise, Inc. (Co-eX), at Docket No. A-110166, whose request was granted January 20, 2006, and Premier Solutions (Premier), at Docket No. A-110170, whose request was granted July 26, 2006. In the case of Co-eX, the company explained that, as a consultant, it will provide its customers with an evaluation and selection process from which to select the best positioned licensed electricity supplier/generator and award business. In the case of Premier, the company explained that it requested an EGS license to become EDI certified with the utilities, in order to be able to efficiently and effectively obtain electricity usage information for the customers to whom it provides consulting

services. Premier intended to utilize the information to help its customers reduce their overall spending for electricity. Premier also stated that it will not take title to power.

The Commission believes that Lower Watt operates in a similar manner and therefore should be granted similar relief and be permitted to provide a bond or other approved security in the reduced amount of \$10,000. However, Lower Watt's bonding level is contingent upon the company's business model as described in this Order. If Lower Watt takes title to generation supply for its customers, and/or charges customers directly for that generation supply, a \$10,000 level of bonding may not be appropriate. Therefore, we will direct Lower Watt to notify the Commission 45 days prior to a change in its business model, whereby Lower Watt takes title to generation supply and/or bills its customers directly for that generation supply. This will provide the Commission with an opportunity to review and adjust Lower Watt's approved bonding level prior Lower Watt implementing those changes.

Lower Watt has provided proofs of publication in the Pennsylvania newspapers and proofs of service to the interested parties as required by the Commission.

As of June 29, 2015, no protests have been filed.

We find that the applicant:

1. Is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the Public Utility Code and lawful Commission orders and regulations, specifically including 52 Pa. Code Chapter 56 (relating to Standards and Billing Practices for Residential Utility Service).

2. Has agreed to lawfully abide by all Commission regulations, procedures and orders, including Emergency Orders, which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.
3. That the proposed service, to the extent authorized by the license, will be consistent with the public interest and the policy declared in the Electricity Generation Customer Choice and Competition Act.

Upon full consideration of all matters of record, we find that approval of this application is necessary and proper for the service, accommodation and convenience of the public; **THEREFORE,**

IT IS ORDERED:

1. That the application of Lower Watt, LLC is hereby approved, consistent with this Order.
2. That Lower Watt, LLC's request for a reduction in the bond level from \$250,000 to \$10,000 is hereby granted.
3. That the security amount of \$10,000 shall remain in effect for Lower Watt, LLC as long as Lower Watt, LLC does not make a change to its business model in Pennsylvania, whereby it would take title to generation supply and/or bill its customers directly for generation supply.
4. That a license be issued authorizing Lower Watt, LLC to begin to offer, render, furnish or supply electricity or electric generation services as a

broker/marketer to residential, small commercial (25 kw and under demand), large commercial (over 25 kw demand), industrial, and governmental customers in all of the electric distribution company service territories throughout the Commonwealth of Pennsylvania.

5. That if Lower Watt, LLC proposes to change its business model as described in Ordering Paragraph No. 3, it must notify the Commission at least 45 days prior to the changes. With the notice, the Company must provide an update to the nature and scope of business information that was required by Pa. Code § 54.40(c) to justify the modification granted in Ordering Paragraph No. 3. This will provide the Commission the opportunity to review Lower Watt, LLC's bonding level and adjust as appropriate, prior to Lower Watt, LLC implementing the proposed changes to its business model.

6. That if Lower Watt, LLC changes its business model without providing to the Commission the notice and information required in Ordering Paragraph No. 5, then the reduced bonding level permitted by Ordering Paragraph No. 2 shall cease effective with the date of the change in the business model. The level of bonding effective at that time shall be \$250,000 or the level required by 52 Pa. Code § 54.40, whichever is greater.

7. That this proceeding at Docket No. A-2015-2470044 be closed.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta", written in a cursive style.

Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: July 8, 2015

ORDER ENTERED: July 8, 2015

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held May 19, 2015

Commissioners Present:

Gladys M. Brown, Chairman
John F. Coleman, Jr., Vice Chairman
James H. Cawley
Pamela A. Witmer
Robert F. Powelson

License Application of Lower Watt LLC for
Approval to Offer, Render, Furnish or Supply
Natural Gas Services as a Broker/Marketer

Docket Number:
A-2015-2466624

ORDER

BY THE COMMISSION:

On February 10, 2015, Lower Watt LLC (Lower Watt), Utility Code 1217312, filed a License Application to operate as a broker/marketer of natural gas supply (NGS) services in the natural gas distribution company (NGDC) service territories of UGI Utilities, Inc., UGI-Central Penn Gas, UGI-Penn Natural Gas, Peoples TWP LLC, PECO Energy Company, Philadelphia Gas Works, National Fuel Gas Distribution Corporation, Peoples Natural Gas Company, LLC, Peoples Natural Gas Company - Equitable Gas Division, Valley Energy, and Columbia Gas of Pennsylvania, Inc., within the Commonwealth of Pennsylvania. This application was filed pursuant to section 2208 of the Natural Gas Choice and Competition Act (Act) and Title 52 of the Pennsylvania Code, Chapter 62, Subchapter D.

§2208 provides in pertinent part that:

Requirements for Natural Gas Suppliers.--No entity shall engage in the business of a natural gas supplier unless it holds a license issued by the Commission. To the extent that a natural gas distribution company provides natural gas supply service outside of its chartered or certificated territory, it also must hold a license. A license shall not be required for customers who make de minimis incidental sales or resales to themselves, an affiliate or to other nonresidential retail gas customers.

66 Pa. C.S. §2208.

A natural gas supplier is defined as:

An entity other than a natural gas distribution company, but including natural gas distribution company marketing affiliates, which provides natural gas supply services to retail gas customers utilizing the jurisdictional facilities of a natural gas distribution company. The term includes a natural gas distribution company that provides natural gas supply services outside its certificated service territories. The term includes a municipal corporation, its affiliates or any joint venture, to the extent that it chooses to provide natural gas supply services to retail customers located outside of its corporate or municipal limits, as applicable, other than:

- (i) as provided prior to the effective date of this chapter, pursuant to a certificate of public convenience if required under this title;
- (ii) total natural gas supply services in de minimis amounts;
- (iii) natural gas supply services requested by, or provided with the consent of, the public utility in whose certificated territory the services are provided; or
- (iv) natural gas supply services provided to the municipal corporation itself or its tenants on land it owns or leases, or is subject to an agreement of sale or pending condemnation, as of September 1, 1999, to the extent permitted by applicable law independent of this chapter.

The term excludes an entity to the extent that it provides free gas to end-users under the terms of an oil or gas lease. Notwithstanding any other provision of this title, a natural gas supplier that is not a natural gas distribution company

is not a public utility as defined in section 102 (relating to definitions) to the extent that the natural gas supplier is utilizing the jurisdictional distribution facilities of a natural gas distribution company or is providing other services authorized by the Commission.

66 Pa. C.S. § 2202.

As used in the above definition of a natural gas supplier, the term natural gas supply services includes: (i) the sale or arrangement of the sale of natural gas to retail customers; and (ii) services that may be unbundled by the Commission under section 2203(3) of the Act (relating to standards for restructuring of the natural gas utility industry). Natural gas supply service does not include distribution service.

66 Pa. C.S. § 2202.

Lower Watt is a foreign limited liability company, formed in New Jersey on June 21, 2011, and registered to do business in the Commonwealth of Pennsylvania on May 29, 2014. Lower Watt has stated that upon the approval of this Application, it proposes to provide natural gas supply services as a Broker/Marketer to residential, small commercial (under 6,000 MCF annually), large commercial (6,000 MCF or more annually), industrial, and governmental customers.

Since Lower Watt will be providing natural gas supplier services to residential customers it is required to comply with, and be governed by, applicable Chapter 56 residential service regulations as set forth in the Commission Order *Guidelines for Maintaining Customer Service at the Same Level of Quality Pursuant to 66 Pa. C. S. §2206(a), Assuring Conformance with 52 Pa. Code Chapter 56 Pursuant to 66 Pa. C.S. §2207(b), §2208(e) and (f) and Addressing the Application of Partial Payments (M-00991249 F003)*. Thus, we deem it appropriate to reiterate certain items with respect to Chapter 56 of our regulations. Chapter 56 (52 Pa Code Chapter 56) is applicable to residential accounts. A natural gas supplier cannot physically disconnect a residential customer from the distribution system, and thus, the rules relating to residential service termination are not applicable to natural gas suppliers. A natural gas supplier may seek to terminate its natural gas services through an appropriate written notice to the customer and

the local distribution company. The residential customer can then attempt to repair his or her relationship with the natural gas supplier, seek a new natural gas supplier, or default to the natural gas distribution company's service tariffed rates in accordance with the local distribution company's obligations under Section 2207(a), 66 Pa. C.S. §2207(a). The customer would only be disconnected from the distribution system pursuant to appropriate regulations if the customer failed to meet his or her obligations to the natural gas distribution company or the natural gas supplier which has been designated by the Commission as the supplier of last resort.

Section 2208(c)(1), 66 Pa. C.S. §2208(c)(1), provides that a natural gas supplier license shall not be issued unless the applicant furnishes a bond or other security in a form and amount to ensure its financial responsibility. The criteria used to establish the form and amount of the bond or other security is set forth in the natural gas distribution company's tariff. The amount and form of the bond or other security may also be mutually agreed to between the natural gas distribution company and the natural gas supplier. Section 2208 also provides that should the parties fail to achieve an agreement, then the form and amount of bond or other financial security "shall be determined by criteria approved by the Commission." Lower Watt has provided documentation to evidence its compliance with the Section 2208(c) bonding requirement for the NGDC service territories of UGI Utilities, Inc., UGI-Central Penn Gas, UGI-Penn Natural Gas, Peoples TWP LLC, PECO Energy Company, Philadelphia Gas Works, National Fuel Gas Distribution Corporation, Peoples Natural Gas Company, LLC, Peoples Natural Gas Company - Equitable Gas Division, Valley Energy, and Columbia Gas of Pennsylvania, Inc., within the Commonwealth of Pennsylvania.

Additionally, we specifically note that the licensee must comply with, and ensure that its employees, agents, representatives and independent contractors comply with the standards of conduct and disclosure for licensees set out in Commission regulations at 52 Pa. Code § 62.114 that were enacted to protect consumers of this Commonwealth. These

standards include, *inter alia*, the provision of timely and accurate information about the services offered by the licensee, the practice of nondiscrimination in service in regard to race, color, religion, national origin, marital status, etc., the safeguarding of a customer's personal information, and compliance with applicable state and federal consumer protection laws. We further note that the licensee and its agents must comply with the Commission's sales and marketing regulations at 52 Pa. Code §111.1, et seq. applicable to residential customers. Among other things, these regulations require the licensee and its agents to provide accurate information about products and services being offered and prohibit a licensee and its agents from engaging in misleading or deceptive conduct and from making false or misleading representations. Also, we take this opportunity to remind the licensee of its agreement to abide by, and to ensure that its employees, representatives, agents and independent contractors abide by all applicable federal and state laws, and Commission regulations, procedures, and orders, including Emergency Orders, which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business.

In accordance with the financial requirements of the NGS license application, Lower Watt has supplied two years of financial statements. With regard to the technical fitness requirements of the NGS license application, Lower Watt provided detailed professional resumes of its chief officers. We find that sufficient information has been provided by Lower Watt to demonstrate its financial and technical fitness in order to be licensed as a NGS in the Commonwealth of Pennsylvania.

Lower Watt has published notice of its application in the Pennsylvania newspapers and provided proofs of service to the interested parties as required by the Commission.

As of May 8, 2015, no protests have been filed.

We find that Lower Watt:

1. Is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the Public Utility Code and the Commission orders and regulations, specifically including 52 Pa. Code Chapter 56 (relating to Standards and Billing Practices for Residential Utility Service).

2. Has agreed to abide by all Commission regulations, procedures and orders, including Emergency Orders, which may be issued verbally or in writing during any emergency situations that may develop from time to time in the course of doing business in Pennsylvania.

3. Has proposed to offer natural gas supply services which, to the extent authorized by the license, will be consistent with the public interest and the policy declared in the Natural Gas Choice and Competition Act.

Upon full consideration of all matters of record, we find that approval of this application is necessary and proper for the service, accommodation and convenience of the public; **THEREFORE,**

IT IS ORDERED:

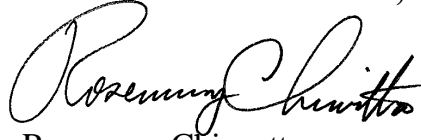
1. That the application of Lower Watt LLC is hereby approved, consistent with this Order.

2. That a license be issued authorizing Lower Watt LLC the right to begin to offer, render, furnish or supply natural gas supply services as a Broker/Marketer to residential, small commercial (under 6,000 MCF annually), large commercial (6,000 MCF

or more annually), industrial, and governmental customers in the natural gas distribution company service territories of UGI Utilities, Inc., UGI-Central Penn Gas, UGI-Penn Natural Gas, Peoples TWP LLC, PECO Energy Company, Philadelphia Gas Works, National Fuel Gas Distribution Corporation, Peoples Natural Gas Company, LLC, Peoples Natural Gas Company - Equitable Gas Division, Valley Energy, and Columbia Gas of Pennsylvania, Inc., within the Commonwealth of Pennsylvania.

3. That this proceeding, at Docket No. A-2015-2466624, be closed.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta", written in a cursive style.

Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: May 19, 2015

ORDER ENTERED: May 19, 2015

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-2015-2466624


The Application of Lower Watt LLC for the right to begin to offer, render, furnish or supply natural gas supply services as a Broker/Marketer to residential, small commercial (under 6,000 MCF annually), large commercial (6,000 MCF or more annually), industrial, and governmental customers in the natural gas distribution company service territories of UGI Utilities, Inc., UGI-Central Penn Gas, UGI-Penn Natural Gas, Peoples TWP LLC, PECO Energy Company, Philadelphia Gas Works, National Fuel Gas Distribution Corporation, Peoples Natural Gas Company, LLC, Peoples Natural Gas Company - Equitable Gas Division, Valley Energy, and Columbia Gas of Pennsylvania, Inc., within the Commonwealth of Pennsylvania.

EFFECTIVE DATE: May 19, 2015

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues, evidencing the Commission's approval, to the applicant this:

LICENSE FOR NATURAL GAS SUPPLIER.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 19th day, of May, 2015.



Secretary

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Lower Watt LLC	:	
	:	
Application for Licensure of Agents,	:	17-0301
Brokers, and Consultants under	:	
Section 16-115C of the Public	:	
Utilities Act.	:	

ORDER

By the Commission:

I. INTRODUCTION

On June 23, 2017, Lower Watt LLC ("Applicant") filed a verified application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to operate as an agent, broker, or consultant ("ABC") in Illinois pursuant to Section 16-115C of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" ("Part 454"). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. Since all of the information to grant the requested relief was contained in the Application, the hearing was waived.

II. REQUIREMENTS FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT

Applicant is a business organized under the laws of New Jersey and authorized to transact business in Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an ABC. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures to preserve the confidentiality of its customers' data. The Applicant has also attested that no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C

Applicant is required by Section 454.60 to demonstrate that it meets the managerial qualifications necessary to provide services as an ABC. Applicant must further provide an organizational chart that indicates the position of persons which satisfy the managerial qualification. Applicant has demonstrated that it meets the managerial qualifications set forth in Section 454.60 through Attachment A to the Application. Attachment A to the Application contains a corporate organizational chart and identifies the occupational background information of the persons being used to meet the requirements of Section 454.60(a). Attachment B contains occupational background information on the person or persons being used to meet the requirements of Section 454.60(a).

Applicant is required by Section 454.70 to demonstrate that it meets the technical qualifications necessary to provide services as an ABC. Applicant has demonstrated that it meets the technical qualifications set forth in Section 454.70 with the information provided in Attachment B. Attachment B contains occupational background information on the person or persons being used to meet the requirements of Section 454.70(a).

Pursuant to the requirements of Section 454.80 of Part 454, Applicant provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois. Applicant further agrees to comply with the Code of Conduct for ABCs contained in Section 454.90.

IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY

The Commission has reviewed the application and attachments provided by Applicant regarding the technical, managerial, and financial requirements and all other requirements of the Act and Part 454 and finds that the Applicant sufficiently demonstrates compliance with the requirements. The Commission concludes, therefore, that Applicant's request for a certificate of service authority to operate as an ABC in Illinois should be granted and should include the following authority:

CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that Lower Watt LLC is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

V. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) Lower Watt LLC, a business organized under the laws of New Jersey and authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16-115C of the Act;
- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) Lower Watt LLC has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;
- (5) Lower Watt LLC has complied with Section 16-115C of the Act and Part 454; and
- (6) Lower Watt LLC should be granted a certificate of service authority to operate as an ABC as specified in this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that Lower Watt LLC is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED that Lower Watt LLC shall comply with all applicable Commission rules and orders now and as hereafter amended.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 15th day of August, 2017.

(SIGNED) BRIEN SHEAHAN

Chairman



THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

MATTHEW A. BEATON
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION
BOSTON, MA 02110
(617) 305-3500

ANGELA M. O'CONNOR
CHAIRMAN

ROBERT E. HAYDEN
COMMISSIONER

CECILE M. FRASER
COMMISSIONER

July 20, 2018

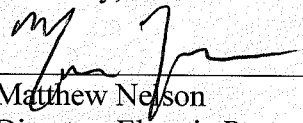
Aharon Gartenberg, President
Lower Watt, LLC
18 Jule Court
Lakewood, NJ 08701

Dear Mr. Gartenberg,

The Department of Public Utilities ("Department") has reviewed Lower Watt, LLC's ("Company") application for renewal of its **Electricity Broker License, EB-369**, and is pleased to inform you that the Company's application for renewal has been approved.

As a condition of maintaining this license, the Company must file updated information within 30 days of any material or organic change in the information required by 220 CMR 11.05(2), and must comply with all relevant requirements of G.L. c. 164, and the regulations promulgated thereunder, including 220 CMR 11.00, 12.00. Consistent with the information included with the Company's application, the activities the Company is licensed to provide are limited to electricity broker services to commercial and industrial customers. If, at a later date, the Company seeks to provide electricity broker services to residential customers, it must first seek and obtain Department approval at the time of renewal of its license. If the Company decides to request renewal of its license next year, please submit the renewal application no later than **June 1, 2019**. The renewal application is available at: <https://www.mass.gov/information-for-competitive-suppliers-and-electricity-brokers>.

Sincerely,


Matthew Nelson
Director, Electric Power Division